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June 19, 2012

Hon. Carol B. Amon
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Government Employees Insurance Co., et al, v. Edovard J. Hazel, M.D., et al.
Docket No. CV 11-0410 (CBA) (RML)

Your Honor:

Although unlike Mr. Baum I am loathe to carry on a personal vendetta through a letter writing campaign to this Court, Mr. Baum's June 1 letter to this Court (Dkt. No. 58) cannot go unanswered. At the outset, this Court should be aware that Mr. Baum and I were partners in the firm of Blodnick & Baum, P.C. from approximately 2007 through 2009. The partnership dissolved amid less than amicable circumstances. Accordingly, any negative aspersions cast by Mr. Baum must be taken with a grain of salt (e.g., referring to me as an "unindicted partner" of Mr. Conroy – I note that Mr. Baum himself is, also, unindicted.)

Although purporting to respond to the May 17 letter from my partner to this Court (Dkt. No. 54), Mr. Baum does not respond to two very salient points- First, that Dr. Ciancimino although claiming to be unaware of having purchased a PC rather than merely its accounts receivable, executed a letter to the NYS Education Department informing that department that he had, in fact, purchased the PC (a copy of that one page letter was submitted with the May 17 letter); and second, that although claiming he had no knowledge of the existence of this lawsuit, the Sale Agreement that Dr. Ciancimino executed in connection with his purchase of the PC specifically disclosed this suit (a copy of that Purchase Agreement was also submitted with the May 17 letter). Therefore, despite having no basis to refute the two pieces of documentary evidence that belie Dr. Ciancimino's self-serving allegations, Mr. Baum merely repeats those allegations, with no support for them. The bulk of Mr. Baum's letter is merely a rehash of what was stated in the April 3, 2012 letter from Barry Levy (Dkt. # 46 herein), with his added editorial comments attacking Mr. Fazio's and my credibility, again with no basis for doing so.

Mr. Baum is simply seizing on a chance to further his personal feud with me. These unfounded, purely speculative allegations, already partially disproven by documents executed in Dr. Cinacimino's own hand, must be recognized by this Court for what they are; spite and bile from a disgruntled former partner, and therefore must be disregarded. Mr. Fazio made statements of fact to this Court in his May 17 letter, all of which are completely truthful and none

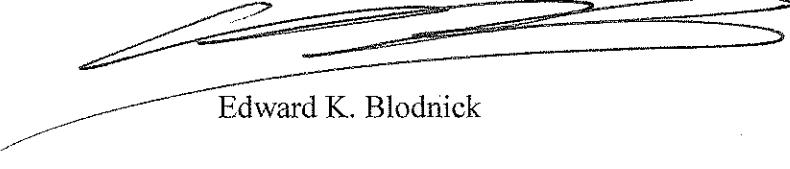
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of which are speculation or opinion. Mr. Baum's letter, to the contrary, is pure accusation with no basis in reality.

Accordingly, Mr. Baum's letter should be disregarded by this Court in its entirety.

Very truly yours,



Edward K. Blodnick

cc: All Counsel (via ECF)